

Kevin H. Sharp

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BRIDGESTONE AMERICAS, INC.,

Plaintiff,

vs.

**INTERNATIONAL BUSINESS
MACHINES CORPORATION,**

Defendant.

Civil Docket No. 3:13-CV-1196

JURY DEMANDED

**INTERNATIONAL BUSINESS
MACHINES CORPORATION,**

Counterclaim Plaintiff,

**Judge Sharp
Magistrate Judge Brown**

vs.

**BRIDGESTONE AMERICAS, INC. and
BRIDGESTONE CORPORATION,**

Counterclaim Defendants.

IBM's MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Defendant/Counterclaim-Plaintiff International Business Machines Corporation ("IBM") moves this Court for leave to file its Response to Bridgestone Corporation's Motion to Dismiss, as well as the Declaration of Christine P. Payne and its exhibits, under seal pursuant to Fed. R. Civ. P. 5.2(d) and Administrative Order No. 167, Section 5.07. In support of this motion, IBM states as follows:

1. IBM's Response to Bridgestone Corporation's Motion to Dismiss contains information from documents and excerpts from deposition transcripts designated confidential under the Amended Protective Order. *See* Dkt. 141.